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Of Attorneys for Defendant

UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON  
PORTLAND DIVISION

DAWN LAGOOD

Plaintiff,

vs.

CONCERO, INC.

Defendant.

Case No.: 3:14-cv-00315-ST

OFFER OF JUDGMENT

Pursuant to Fed. R. Civ. P. 68, Defendant Concero, Inc. offers to allow judgment to be entered against it and in favor of plaintiff Dawn LaGood in the total aggregate amount of ONE HUNDRED FIFTY THOUSAND DOLLARS (\$150,000.00), inclusive of damages, legally recoverable costs, legally recoverable attorney's fees and legally recoverable expenses.

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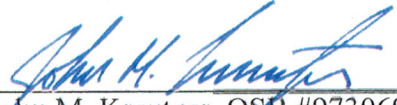
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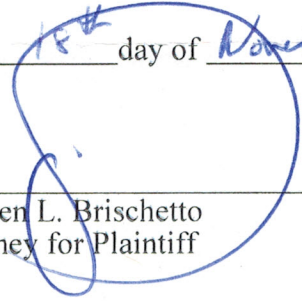
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Dated this 6<sup>th</sup> day of November, 2014.

SMITH FREED & EBERHARD, P.C.

By:   
John M. Kreutzer, OSB #973069  
jkreutzer@smithfreed.com  
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Of Attorneys for Defendant

Plaintiff accepts the above Offer of Judgment this 18<sup>th</sup> day of November, 2014.

By:   
Stephen L. Brischetto  
Attorney for Plaintiff

**CERTIFICATE OF SERVICE**

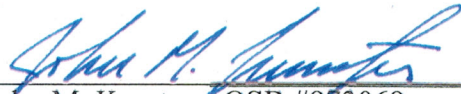
I HEREBY CERTIFY that on November 6, 2014 I caused to be served the foregoing **DEFENDANT'S OFFER OF JUDGMENT**, on the following individual by **mailing** a full, true and correct copy thereof in a sealed, first-class postage-prepaid envelope, addressed as shown below, the last-known address for said individual, and deposited with the United States Postal Service at Portland, Oregon on the date set forth above and provided a courtesy copy by **emailing** a true and correct copy to the email address stated below.

Stephen L. Brischetto  
Attorney at Law  
621 SW Morrison St., Ste. 1025  
Portland, OR 97205  
[slb@brischettolaw.com](mailto:slb@brischettolaw.com)

Dated this 6th day of November, 2014.

SMITH FREED & EBERHARD, P.C.

By:

  
John M. Kreutzer, OSB #973069  
[jkreutzer@smithfreed.com](mailto:jkreutzer@smithfreed.com)  
Matthew B. Duckworth, OSB #022994  
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Telephone: (503) 227-2424  
Of Attorneys for Defendant

## CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing **ACCEPTANCE OF OFFER OF JUDGMENT**:

John M. Kreutzer  
Smith Freed & Eberhard PC  
111 SW 5<sup>th</sup> Avenue, Suite 4300  
Portland, Oregon 97204

Of Attorneys for Defendants

☐ HAND DELIVERY  
☐ U.S. MAIL  
☐ FAX  
☐ E-MAIL  
☒ ECF

by delivering this date to said attorney(s) a true copy thereof as stated above. I further certify that documents delivered by mail were contained in sealed envelopes, addressed as above stated, to the last-known addresses of said attorney(s). Documents delivered by mail were deposited in the post office at Portland, Oregon with postage thereon prepaid. Documents served through ECF were served through the electronic service function of the court's efilng program.

DATED: November 19, 2014.

*s/Stephen L. Brischetto*  
Stephen L. Brischetto  
OSB 781564  
(503) 223-5814  
Attorney for Plaintiff